

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	Cr. No. 05-00189DAE-01
)	
Plaintiff,)	
)	
v.)	
)	
KEITH SEICHI IMAI, (01))	DEFENDANT IMAI'S MOTION
)	TO CONTINUE TRIAL
Defendant.)	
_____)	

DEFENDANT IMAI'S MOTION TO CONTINUE TRIAL

Comes Now, KEITH SEICHI IMAI, Defendant herein, by and through his attorney, MYLES S. BREINER, and hereby moves this Honorable Court to continue trial in the instant case because Defendant Imai has been prejudiced by the Government's: (1) late disclosure of witnesses and Brady and Giglio material, (2) the Government's decision on the eve of trial to issue a Superseding Indictment after nearly eighteen (18) months of Government requested continuances, and (3) the Government's failure to fully and completely disclose the extent of the assistance rendered by the various co-defendants and other cooperating suspects/witnesses in this and other on-going criminal investigations.¹

DATED: Honolulu, Hawaii, 11/20, 2006.


MYLES S. BREINER

Attorney for Defendant

¹The matter of the Government's repeated trial continuances since Defendant Imai's indictment on April 15, 2005 under the guise of seeking a Superseding Indictment will be the subject of a separate Motion to Dismiss For Prosecutorial Misconduct.